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BELLAGIO, LLC and VINCENT ROTOLO

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ANDI KRAJA,

Plaintiff,

vs.

BELLAGIO, LLC, a Nevada Corporation;
VINCENT ROTOLO, an individual; ROE
Business Organizations I-X; and DOE
INDIVIDUALS I-X, Inclusive,

Defendants.

Case No. 2:15-cv-01983-APG-NJK

**[PROPOSED] STIPULATION AND
ORDER TO TAKE DEPOSITION OF
THIRD PARTY WITNESSES OUTSIDE
CLOSE OF DISCOVERY**

Plaintiff, ANDI KRAJA and Defendants, BELLAGIO, LLC and VINCENT ROTOLO, by and through their respective counsel of record, stipulate and agree to take the depositions of two third party witnesses outside the June 17, 2016 close of discovery. This stipulation is requested by Defendants and agreed to by Plaintiff because Plaintiff disclosed third party witnesses Megan French and Fernando Talag and produced their affidavits on June 7, 2016, only ten days before the June 17, 2016 close of discovery. According to Plaintiff's disclosures, these witnesses are "expected to have knowledge and testify as to . . . personal observations of the changes in Plaintiff's physical and/or mental condition/status." Depositions of several party witnesses were scheduled from June 7, 2016

through June 17, 2016, making it impossible to notice depositions of these witnesses before the close of discovery. Prior to the June 17, 2016, close of discovery, Defendants' counsel requested that Plaintiff's counsel permit these third party depositions take place outside the close of discovery in light of their disclosure near the end of the discovery period. Defendants intend to notice the depositions for July 15, 2016, thus the depositions should not impact the August 8, 2016, dispositive motion deadline.

Accordingly, the parties request the Court permit depositions of Megan French and Fernando Talag take place outside the close of discovery. This request is made in good faith and not for the purpose of delay.

Dated: July 5, 2016

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Respectfully submitted,

Respectfully submitted,

/s/ James P. Kemp

/s/ Amy L. Baker

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BELLAGIO, LLC and VINCENT ROTOLO

ORDER

IT IS SO ORDERED.

Dated: July 6, 2016.


UNITED STATES MAGISTRATE JUDGE

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